



KCC Corporate Risk Register

Corporate Risk Register - Summary Risk Profile

Low = 1-6
Medium = 8-15
High =16-25

Risk No.*	Risk Title	Current Risk Rating	Target Risk Rating	Direction of Travel since July 2018
CRR0001	Safeguarding – protecting vulnerable children	15	15	↔
CRR0002	Safeguarding – protecting vulnerable adults	20	15	↔
CRR0003	Access to resources to aid economic growth and enabling infrastructure	16	12	↔
CRR0004	Civil Contingencies and Resilience	16	12	↑
CRR0005	Implementation of Local Care and Prevention with Health partners in Kent	12	8	**
CRR0006	Resourcing implications arising from increasing complex adult social care demand	20	15	↔ (target increased)
CRR0007	Resourcing implications arising from children's services demand	20	12	↔
CRR0009	Future financial and operating environment for local government	20	12	↑
CRR0011	Embedding KCC's strategic commissioning approach and consistency of commissioning standards	9	6	↔
CRR0013	Delivery of in-year savings within agreed budgets	9	4	↔ (target increased)
CRR0014	Cyber-attack threats and their implications	16	12	↔
CRR0015	Managing and working with the social care market	20	15	↔ (target increased)
CRR0016	Delivery of new school places is constrained by capital budget pressures and dependency on the Education and Skills Funding Agency	16	12	↓
CRR0039	Information Governance	12	8	↔
CRR0040	Opportunities and risks associated with KCC's Local Authority Trading Companies	12	4	↔
CRR0041	Maintaining a healthy and effective workforce	12	8	↑
CRR0042	Post-Brexit border systems, infrastructure and regulatory arrangements	20	16	↔ (target increased)

CRR0044	High Needs Funding and adequacy of support for children with SEND	20	12	NEW
CRR0045	Effectiveness of governance within a Member-led Authority	10	5	NEW

*Each risk is allocated a unique code, which is retained even if a risk is transferred off the Corporate Register. Therefore there will be some 'gaps' between risk IDs.

** Context of the risk has been changed, hence direct comparison of score not applicable.

NB: Current & Target risk ratings: The 'current' risk rating refers to the current level of risk taking into account any mitigating controls already in place. The 'target residual' rating represents what is deemed to be a realistic level of risk to be achieved once any additional actions have been put in place. On some occasions the aim will be to contain risk at current level.

Risk ID	CRR0001	Risk Title	Safeguarding – protecting vulnerable children			
Source / Cause of risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
The Council must fulfil its statutory obligations to effectively safeguard vulnerable children.		Ability to fulfil statutory obligations affected by demand for services exceeding capacity and capability, or adequacy of management and operational practice.	Serious impact on vulnerable people.	Matt Dunkley Corporate Director	Possible (3)	Major (5)
In addition, the Government's "Prevent Duty" requires the Local Authority to act to prevent people from being drawn into terrorism, with a focus on the need to safeguard children at risk of being drawn into terrorism.		Failure to recruit and retain suitably experienced and qualified permanent staff.	Impact on ability to recruit the quality of staff critical to service delivery.	Children, Young People and Education (CYPE)		
This risk links to the demand for children's services risk (CRR0007).		Failure to meet the requirements of the "Prevent Duty" placed on Local Authorities.	Serious operational and financial consequences.	Responsible Cabinet Member(s):	Target Residual Likelihood	Target Residual Impact
			Attract possible intervention from a national regulator for failure to discharge corporate and executive responsibilities.	Roger Gough Children, Young People and Education	Possible (3)	Major (5)
			Incident of serious harm or death of a vulnerable child.	Mike Hill (Lead Member for PREVENT)		
Control Title					Control Owner	
Consistent scrutiny and performance monitoring through Divisional Management Team, District 'Deep Dives' and audit activity					Sarah Hammond, Director of Integrated Services (Children's Social Work Lead)	
Independent scrutiny by Kent Safeguarding Children Board					Independent Chair Kent Safeguarding Children Board	
Manageable caseloads per social worker and robust caseload monitoring. Social work vacancies monitored with action taken to address as required					Sarah Hammond, Director of Integrated Services (Children's Social Work Lead)	

Active strategy in place to attract, recruit and retain social workers through a variety of routes with particular emphasis on experienced social workers	Sarah Hammond, Director of Integrated Services (Children's Social Work Lead)/ Amanda Beer, Corporate Director Engagement, Organisational Design & Development (EODD)
Multi-agency public protection arrangements in place	Risthardh Hare, Interim Assistant Director Safeguarding and Quality Assurance
Extensive staff training – Specialist Children's Services and Early Help and Preventative services are adopting the 'Signs of Safety' model of intervention, a standardised child-focused model of risk analysis, risk management and safety planning	Sarah Hammond, Director of Integrated Services (Children's Social Work Lead) / Stuart Collins, Director Integrated Services (Early Help and Preventative Services Lead)
Regular reporting on safeguarding takes place quarterly for Directors and Cabinet Members, with an annual report for elected Members, to allow for scrutiny of progress	Matt Dunkley, Corporate Director, CYPE
Prevent Duty Delivery Board (chaired by KCC) oversees the activity of the Kent Channel Panel, co-ordinating Prevent activity across the County and reporting to other relevant strategic bodies in the county (including reporting route to the Kent Safeguarding Children Board)	Penny Southern, Corporate Director, Adult Social Care and Health (ASCH)
Kent Channel Panel (early intervention mechanism providing tailored support to people who have been identified as at risk of being drawn into terrorism) in place	Nick Wilkinson, Prevent and Channel Strategic Manager
Multi-agency risks, threats and vulnerabilities group focuses on PREVENT, gangs, Modern slavery, human trafficking and online safeguarding matters	Nick Wilkinson, Prevent and Channel Strategic Manager
Safeguarding and Quality Assurance Unit conducts audits, reviews of practice and provides challenge	Sarah Hammond, Director of Integrated Services (Children's Social Work Lead)
Education Safeguarding Team in place	Claire Ray, Principal Officer Education Safeguarding, The Education People
A revised Elective Home Education policy approved that includes interaction with children where there are	Keith Abbott, Director

welfare concerns and where other agencies have been involved with the family. Awareness raising taking place with other practitioners	Education Planning & Access/ Scott Bagshaw, Head of Admissions & Transport	
Multi-function officer group helping to define key steps and approach to aid any future inquiries or investigations that may arise relating to alleged historical abuse	Risthardh Hare, Interim Assistant Director Safeguarding and Quality Assurance	
Multi-agency Crime and Sexual Exploitation Panel (MACSE) provides a strategic, county-wide, cross-agency response to Child Sexual Exploitation	Matt Dunkley Corporate Director, CYPE (KCC lead)	
Three year PREVENT training strategy being rolled out. Staff intranet site dedicated to Prevent. Information also available on KCC website	Nick Wilkinson, Prevent and Channel Strategic Manager	
Integrated practice model in place	Sarah Hammond, Director of Integrated Services (Children's Social Work Lead) / Stuart Collins, Director Integrated Services (Early Help and Preventative Services Lead)	
Detailed understanding of requirements for Joint Targeted Area Inspections	Sarah Hammond, Director of Integrated Services (Children's Social Work Lead)	
Kent and Medway Gangs Strategy 2018-21 outlines the multi-agency approach to ending the criminal exploitation of vulnerable children and adults by gangs	Stuart Collins, Director Integrated Services (Early Help and Preventative Services lead)	
Action Title	Action Owner	Planned Completion Date
Preparation for new multi-agency safeguarding arrangements in response to Children & Social Work Act requirements	Matt Dunkley, Corporate Director CYPE / David Whittle, Director SPRCA	April 2019 (review)

Risk ID	CRR0002	Risk Title	Safeguarding – protecting vulnerable adults			
Source / Cause of risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
The Council must fulfil its statutory obligations to effectively safeguard vulnerable adults.		Ability to fulfil statutory obligations affected by demand for services exceeding capacity and capability; adequacy of practice; or quality of care in the provider market.	Serious impact on vulnerable people.	Penny Southern, Corporate Director Adult Social Care and Health (ASCH)	Likely (4)	Major (5)
The change from ‘safeguarding alerts’ to ‘safeguarding enquiries’ has led to a significant increase in the number of safeguarding concerns received. There has also been an increase in domestic abuse referrals.		Failure to meet the requirements of the “Prevent Duty” placed on Local Authorities.	Serious impact on ability to recruit the quality of staff critical to service delivery.			
In addition, the Government’s “Prevent Duty” requires the Local Authority to act to prevent people from being drawn into terrorism.			Serious operational and financial consequences.	Responsible Cabinet Member:	Target Residual Likelihood	Target Residual Impact
This risk links to the demand risk (CRR0006)			Attract possible intervention from a national regulator for failure to discharge corporate and executive responsibilities.	Graham Gibbens, Adult Social Care and Public Health	Possible (3)	Major (5)
			Incident of serious harm or death of a vulnerable adult.	Mike Hill (Lead Member for PREVENT)		
Control Title					Control Owner	
Dedicated safeguarding team in place with countywide overview					Julie Davidson, Interim Head of Adult Safeguarding	
Multi agency public protection arrangements in place					Julie Davidson, Interim Head of Adult Safeguarding	
Kent & Medway Safeguarding Adults Board in place with key agencies. The Board is on a statutory footing following implementation of the Care Act					Penny Southern, Corporate Director ASCH	
Consistent scrutiny and performance monitoring through divisional management teams, ‘deep dives’ and audit activity					Divisional Directors / Julie Davidson, Interim, Head of Adult Safeguarding	

Regular reporting on safeguarding takes place for Directors and elected Members to allow for scrutiny of progress	Penny Southern, Corporate Director ASCH	
Quarterly Safeguarding Directorate Management Team provides additional dedicated focus to the issue	Penny Southern, Corporate Director ASCH	
Prevent Duty Delivery Board (chaired by KCC) oversees the activity of the Kent Channel Panel, co-ordinating Prevent activity across the County and reporting to other relevant strategic bodies in the county	Penny Southern, Corporate Director ASCH	
Multi agency risks, threats and vulnerabilities group focuses on PREVENT, gangs, modern slavery, human trafficking and online safeguarding matters	Nick Wilkinson, Prevent and Channel Strategic Manager	
Kent Channel Panel (early intervention mechanism providing tailored support to people who have been identified as at risk of being drawn into terrorism) in place	Nick Wilkinson, Prevent and Channel Strategic Manager	
Three year PREVENT training strategy approved by the Corporate Management Team	Nick Wilkinson, Prevent and Channel Strategic Manager	
Capability framework for safeguarding and the mental capacity act introduced	Julie Davidson, Interim Head of Adult Safeguarding	
Kent and Medway Safeguarding Adults Board Learning and Development Competence Framework is reviewed annually	Julie Davidson, Interim Head of Adult Safeguarding	
New framework for safeguarding practice developed as part of the new ASCH operating model	Julie Davidson, Interim Head of Adult Safeguarding / Divisional Directors	
Action Title	Action Owner	Planned Completion Date
Commission independent audits of case files across all client categories to complement internal reviews and audits	Julie Davidson, Interim Head of Adult Safeguarding	March 2019

Risk ID	CRR0003	Risk Title	Access to resources to aid economic growth and enabling infrastructure			
Source / Cause of Risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
The Council seeks access to resources to develop the enabling infrastructure for economic growth, regeneration and health.		Inability to secure sufficient contributions from development to support growth.	Key opportunities for growth missed.	Barbara Cooper, Corporate Director Growth, Environment and Transport (GET) Responsible Cabinet Member(s): Mark Dance, Economic Development Mike Whiting, Planning, Highways, Transport & Waste	Likely (4)	Serious (4)
However, in parts of Kent, there is a significant gap between the costs of the infrastructure required to support growth and the Council's ability to secure sufficient funds through s106 contributions, Community Infrastructure Levy and other growth levers to pay for it.		Funders do not recognise Kent priorities for investment.	The Council finds it increasingly difficult to fund KCC services across Kent (e.g. schools, waste services) and deal with the impact of growth on communities.		Target Residual Likelihood	Target Residual Impact
At the same time, Government funding for infrastructure is limited and competitive and increasingly linked with the delivery of housing and employment outputs.		Lack of resources to continuously shape and determine bids.	Kent becomes a less attractive location for inward investment and business.		Possible (3)	Serious (4)
A UK Shared Prosperity Fund will replace EU structural funds, with further clarity to be provided on how to access, and links with Local Enterprise Partnerships (also being reviewed) and the development of Local Industrial Strategies.			Our ability to deliver an enabling infrastructure becomes constrained.			
			Reputational risk.			
Control Title					Control Owner	
Growth and Infrastructure Framework for Kent and Medway published, setting out the infrastructure needed to deliver planned growth					Stephanie Holt-Castle, Interim Director Environment Planning & Enforcement (EPE)	
Environment Planning & Enforcement and Economic Development teams working with each individual District					David Smith, Director	

on composition of infrastructure plans including priorities for the CIL and Section 106 contributions, from which gaps can be identified	Economic Development / Stephanie Holt-Castle, Interim Director EPE	
Coordinated approach in place between Development Investment Team and service directorates	David Smith, Director Economic Development	
Dedicated team in Economic Development in place, working with other KCC directorates, to lead on major sites across Kent	David Smith, Director Economic Development	
Strong engagement of private sector through Kent and Medway Economic Partnership (KMEP), Business Advisory Board and Kent Developer Group	David Smith, Director Economic Development	
Strong engagement with South East LEP and with central Government to ensure that KCC is in a strong position to secure resources from future funding rounds	Dave Hughes, Head of Business and Enterprise	
KCC is actively engaged in preparation of local plans across Kent and Medway, responding to all consultations	Tom Marchant, Head of Strategic Planning & Policy	
Local Transport Plan 4 produced and approved by County Council	Tom Marchant, Head of Strategic Planning & Policy	
Organisation Development plan is targeting gaps in resources to support bids.	GET Directorate Management Team	
KCC has responded to the Government's 'Strengthened Local Enterprise Partnerships' review	David Smith, Director Economic Development	
Action Title	Action Owner	Planned Completion Date
Contribute to refresh of Strategic Economic Plan	Barbara Cooper, Corporate Director Growth, Environment and Transport	January 2019
Engage with stakeholders to draw up an agreed Enterprise & Productivity Strategy 2018-2050	David Smith, Director Economic Development	February 2019
Respond to consultation on Government's UK Shared Prosperity Fund	David Smith, Director Economic Development	December 2018
Work with LEP partners to implement new LEP arrangements arising from the 'Strengthened Local Enterprise Partnerships' review as appropriate	David Smith, Director Economic Development	April 2019

Risk ID	CRR0004	Risk Title	Civil Contingencies and Resilience			
Source / Cause of Risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
The Council, along with other Category 1 Responders in the County, has a legal duty to establish and deliver containment actions and contingency plans to reduce the likelihood and impact of major incidents and emergencies. This includes responses associated with the Government's Counter-terrorism Strategy (CONTEST) 2018.		Failure to deliver suitable planning measures, respond to and manage these events when they occur.	Potential increased harm or loss of life if response is not effective.	On behalf of CMT: Barbara Cooper, Corporate Director Growth, Environment & Transport (GET)	Likely (4)	Serious (4)
Ensuring that the Council works effectively with partners to respond to, and recover from, emergencies and service interruption is becoming increasingly important in light of recent national and international security threats, severe weather incidents, threats of 'cyber attacks' and uncertainties around implication of a 'no-deal' Brexit.		Critical services are unprepared or have ineffective emergency and business continuity plans and associated activities.	Serious threat to delivery of critical services.	Responsible Cabinet Member(s): On behalf of Cabinet: Mike Hill, Community & Regulatory Services	Target Residual Likelihood	Target Residual Impact
		Lack of resilience in the supply chain hampers effective response to incidents.	Increased financial cost in terms of damage control and insurance costs.		Possible (3)	Serious (4)
		Focus on 'no-deal' Brexit contingency planning means less opportunity to progress other aspects of emergencies and resilience agenda.	Adverse effect on local businesses and the Kent economy. Possible public unrest and significant reputational damage. Legal actions and intervention for failure to fulfill KCC's obligations under the Civil Contingencies Act or other associated legislation.			
Control Title				Control Owner		
Legally required multi-agency Kent Resilience Forum in place, with work driven by risk and impact based on Kent's Community Risk Register. Includes sub-groups relating to Health and Severe Weather				Mike Overbeke, Head of Public Protection (for Kent Resilience Team Activity)		
The Director of Public Health works through local resilience fora to ensure effective and tested plans are in					Andy Scott-Clark, Director of	

place for the wider health sector to protect the local population from risks to public health	Public Health
Management of financial impact to include Bellwin scheme	Cath Head, Head of Finance (Operations)
Implementation of Kent's Climate Adaptation Action Plan	Carolyn McKenzie, Head of Sustainable Business and Communities
Local multi-agency flood response plans in place for each district / borough in Kent, in addition to overarching flood response plan for Kent	Fiona Gaffney, Head of Resilience and Emergency Planning and Kent Resilience Team Manager (KCC)
On-going programme of review relating to ICT Disaster Recovery and Business Continuity arrangements. ICT resilience improvements are embedded as part of the ICT Transformation Programme	Rebecca Spore, Director of Infrastructure
Kent Resilience Team in place bringing together personnel from KCC, Kent Police and Kent Fire and Rescue Service in an integrated and co-located team to deliver enhanced emergency planning and business continuity in Kent	Mike Overbeke, Head of Public Protection
Multi-Agency recovery structures are in place at the Strategic and Tactical levels & working effectively over the short term	Stephanie Holt-Castle, Interim Director Environment Planning & Enforcement (EPE)
KCC and local Kent Resilience Forum partners have tested preparedness for chemical, biological, radiological, nuclear and explosives (CBRNE) incidents and communicable disease outbreaks in line with national requirements	Andrew Scott-Clark, Director Public Health
Emergency planning training rolled out at strategic, tactical and operational levels. KCC Resilience Programme in place to deliver further training opportunities and exercises regularly conducted to test different elements of KCC emergency and business continuity arrangements with partners	Stephanie Holt-Castle, Interim Director EPE
Updated and expanded Duty and Recovery Director rota introduced	Stephanie Holt-Castle, Interim Director EPE
KCC Business Continuity Management Policy and overarching Business Continuity Plan in place, underpinned by business continuity plans at service level	Stephanie Holt-Castle, Interim Director EPE
Prevent Duty Delivery Board established to oversee the activity of the Kent Channel Panel, co-ordinate Prevent activity across the County and report to other relevant strategic bodies in the county	Penny Southern, Corporate Director ASCH

Kent Channel panel (early intervention mechanism providing tailored support to people who have been identified as at risk of being drawn into terrorism) established at district and borough level	Nick Wilkinson, Prevent and Channel Strategic Manager	
Ongoing development of a counter-terrorism local profile	Nick Wilkinson, Prevent and Channel Strategic Manager	
Quality Assurance approach introduced for business continuity plans to emphasise service accountability. This includes the testing of interdependencies between KCC business continuity plans and those of 3 rd parties	Stephanie Holt-Castle, Interim Director EPE	
Fire Safety Guidance provided by KCC reviewed and updated	Flavio Walker, Head of Health & Safety	
Local procedures have been and are being continually reviewed and refined for occasions the national threat level increases to critical. This includes an update of the Corporate Business Continuity Plan	Stephanie Holt-Castle, Interim Director EPE	
New approach to Business Continuity Governance arrangements implemented, to enable increased focus on directorate issues and complement KCC's cross-directorate Resilience group	Fiona Gaffney, Head of Resilience and Emergency Planning and Kent Resilience Team Manager (KCC)	
Kent Resilience Forum Local Authorities Emergency Planning group's mutual aid arrangements with District Councils and other councils across the region undertaken	Fiona Gaffney, Head of Resilience and Emergency Planning and Kent Resilience Team Manager (KCC)	
Action Title	Action Owner	Planned Completion Date
Exercise the procedures for a move in national threat level	Stephanie Holt-Castle, Interim Director EPE	March 2019
Respond to any issues arising from most recent audit of KCC Business Continuity arrangements	Corporate Management Team	February 2019
Building resilience into Multi-agency recovery structures for a longer time response	Stephanie Holt-Castle, Interim Director EPE	March 2019
KCC services to review business continuity arrangements, taking potential no-deal Brexit scenarios into consideration (cross-reference to CRR0042)	Service Managers	February 2019

Risk ID	CRR0005	Risk Title	Implementation of Local Care and Prevention with Health partners in Kent			
Source / Cause of Risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
The health & social care 'system' is under extreme pressure to cope with increasing levels of demand and financial constraints.		Failure to maximise opportunities for appropriate health & social care integration and ensure changes achieve maximum benefit.	Further deterioration in the financial and service sustainability of Health and Social Care system in Kent and Medway.	Penny Southern, Corporate Director Adult Social Care & Health (ASCH)	Possible (3)	Serious (4)
National government policy for integration of health and social care as part of how to meet these challenges.		Pressures within the acute health sector result in repercussions for social care and threaten successful implementation of joint working arrangements.	Additional budget pressures transferred to social care as system monies are used to close acute and primary care service gaps.	Vincent Godfrey, Strategic Commissioner	Target Residual Likelihood Unlikely (2)	Target Residual Impact Serious (4)
NHS national policy is for health commissioners and providers to come together and develop place-based plans. KCC is part of the Kent and Medway Sustainability and Transformation Partnership (STP) and this partnership will evolve to form an integrated care system (ICS).		Improved Better Care Fund monies earmarked for social care geared to addressing pre-determined NHS targets and priorities.	Legal challenge/judicial review of decisions and decision-making framework for integrated decisions.	Andrew Scott-Clark, Director Public Health		
Integration can only happen at local level around GP clusters.		Performance issues in the Health Sector have knock-on implications for KCC.	Social care and public health service priorities determined by NHS, not KCC.	Responsible Cabinet Member(s): Paul Carter, Leader of the Council		
It is important that KCC understands the opportunities and challenges of an ICS and also the upcoming NHS 10 year plan and social care Green Paper.		Failure to meet statutory duties around the sufficiency of the care market, care quality and safeguarding.	Capitated provider contracts dominated by NHS budgets and targets.	Catherine Rankin, Strategic Commissioning		
Care Quality Commission now conducts reviews of health and social care 'systems' to find out how services are working together to care for people aged 65 and over.		Opportunity cost from spending time and resources on STP and system design which is subject to change from NHS England.	Focus on STP and ICS workstreams prevents more local and agile improvements/joint working being undertaken.	Graham Gibbens, Adult Social Care and Public Health		
		Lack of understanding within KCC of NHS policy and regulatory environment; and				

<p>vice versa, lack of understanding of local authority legislative, policy and democratic environment in NHS.</p>	<p>Erosion of long-term working relationships between NHS and local government.</p> <p>Reputational damage to either KCC or NHS or both in Kent.</p> <p>Adverse outcome from CQC local system review.</p>
Control Title	Control Owner
KCC has a designated Cabinet Member Portfolio for Health Reform and Cabinet Member for Strategic Commissioning	Paul Carter, Leader of the Council
Local Care Implementation Board in place	Paul Carter, Leader of the Council
Regular internal STP co-ordination meetings chaired by the Leader	Paul Carter, Leader of the Council
Establishment of a Health Reform and Public Health Cabinet Committee to provide non-executive member oversight and input of KCC involvement in the STP	Ben Watts, General Counsel
Senior KCC political and officer representation on the STP Programme Board	<p>Penny Southern, Corporate Director ASCH</p> <p>Andrew Scott-Clark, Director Public Health</p>
Senior KCC level officer representation on the East Kent ICS, and emerging West, North and Medway ICS	Penny Southern, Corporate Director ASCH
Senior KCC level officer representation across STP workstreams	<p>Penny Southern, Corporate Director ASCH</p> <p>Andrew Scott-Clark, Director Public Health</p>
KCC STP Secretariat established to manage and monitor ongoing engagement and activity	Penny Southern, Corporate Director ASCH

County Council agreed framework for KCC engagement within the STP – ongoing monitoring and control taking place through STP Secretariat	Penny Southern, Corporate Director ASCH	
A joint KCC and Medway Health and Wellbeing Board for STP related matters/issues has been established	David Whittle, Director SPRCA	
KCC has appointed an elected Member to the STP non-executive oversight group	Paul Carter, Leader of the Council	
Public Health Leadership for the STP Prevention workstream	Andrew Scott-Clark, Director Public Health	
Action Title	Action Owner	Planned Completion Date
Engagement with the new NHS Strategic Commissioner for Kent and Medway and alignment of strategic commissioning intentions with KCC Strategic Commissioner	Vincent Godfrey, Strategic Commissioner	January 2019 (review)
Delivery of the Adult Social Care and Health Local Care Implementation Plan	Penny Southern, Corporate Director ASCH	March 2019 (review)
Assess NHS 10-year plan and impact on the STP	David Whittle, Director SPRCA	January 2019
Public Health advice to new Service Commissioning Board as per KCC statutory requirement	Andrew Scott-Clark, Director Public Health	January 2019
Delivery of Kent and Medway STP Prevention Plan	Andrew Scott-Clark, Director Public Health	March 2019 (review)
10 year plan and Kent JSNA/Case for Change	Andrew Scott-Clark, Director Public Health	August 2019

Risk ID	CRR0006	Risk Title	Resourcing implications arising from increasing complex adult social care demand			
Source / Cause of risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
Adult social care services across the country are facing growing pressures. The cost of adult social care services in Kent continues to increase due to the complexity of presenting need, including increasing numbers of young adults with long-term complex care needs.		Council is unable to manage and resource to future demand and its services consequently do not meet future statutory obligations and/or customer expectations.	Customer dissatisfaction with service provision. Increased and unplanned pressure on resources. Decline in performance.	Penny Southern, Corporate Director Adult Social Care and Health (ASCH)	Likely (4)	Major (5)
This is all to be managed against a backdrop of reductions in Government funding, implications arising from the implementation of the Care Act, increases in Deprivation of Liberty Assessments, impacts associated with reducing budgets of partner agencies and longer-term demographic pressures.			Legal challenge resulting in adverse reputational damage to the Council. Financial pressures on other council services.	Responsible Cabinet Member(s): Graham Gibbens, Adult Social Care and Public Health	Target Residual Likelihood Possible (3)	Target Residual Impact Major (5)
Adult social care services are part of a complex system to meet needs, which requires the whole system to work cohesively.						
Control Title				Control Owner		
Regular analysis and refreshing of forecasts to maintain the level of understanding of volatility of demand, which feeds into the relevant areas of the MTFP and the business planning process				Penny Southern, Corporate Director ASCH		
Continued support for investment in preventative services through voluntary sector partners				Penny Southern, Corporate Director ASCH / Vincent Godfrey, Strategic Commissioner		
Public Health & Social Care ensures effective provision of information, advice and guidance to all potential				Andrew Scott-Clark, Director		

and existing service users, promoting self-management to reduce dependency	Public Health/ ASCH Divisional Directors	
Best Interest Assessments (BIA) training package delivered as part of a rolling programme twice yearly	Julie Davidson, Interim Head of Adult Safeguarding	
Continual review and monitoring of demand in relation to Deprivation of Liberty assessments (DoLs) with external resources brought in as necessary. Increased data cleansing has led to an improved overview of backlog cases	Julie Davidson, Interim Head of Adult Safeguarding	
Targeted use of additional social care monies received from Government, investing in services which evidence suggests will have the greatest impact	Penny Southern, Corporate Director ASCH	
Action Title	Action Owner	Planned Completion Date
Implementation of Kent Integration and Better Care Fund plan	Penny Southern, Corporate Director ASCH	December 2018 (review)
Embedding of new operating model for Adult Social Care and Health, including Promoting Wellbeing approach to help manage demand	Penny Southern, Corporate Director ASCH	April 2019 (review)
Agree approach for utilisation of additional social care monies for 2018/19	Penny Southern, Corporate Director ASCH	January 2019

Risk ID	CRR0007	Risk Title	Resourcing implications arising from Children's Services demand			
Source / Cause of risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
Local Authorities continue to face increasing demand for specialist children's services due to a variety of factors, including consequences of highly publicised child protection incidents and serious case reviews, a marked increase in children with Special Educational Needs and Disabilities (SEND) and policy/legislative changes.		High volumes of work flow into Early Help and Preventative Services (EHPS) and Specialist Children's Services (SCS) leading to unsustainable pressure being exerted on them (recognising seasonal spikes such as end of term).	Children's services performance declines as demands become unmanageable.	Matt Dunkley, Corporate Director CYPE	Likely (4)	Major (5)
At a local level KCC is faced with particular 'pressure points' in several districts.		Failure to maximise opportunities offered by integration of EHPS and SCS where appropriate.	Failure to deliver statutory obligations and duties or achieve social value.	Responsible Cabinet Member(s): Roger Gough Children, Young People and Education	Target Residual Likelihood	Target Residual Impact
These challenges need to be met as early help and preventative services and specialist children's services face increasingly difficult financial circumstances and operational challenges.			Additional financial pressures placed on other parts of the Authority at a time of severely diminishing resources.		Possible (3)	Serious (4)
The Council needs to remain aware of London Boroughs, utilising higher per-capita funding and large capital/reserve budgets to procure sites in Kent to ease their overspends on housing/homelessness, due to potential demand implications.			Ultimately an impact on outcomes for children, young people and their families.			
Control Title				Control Owner		
The Early Help and Preventative Services Programme is working to ensure that vulnerable families can access the right support through intensive work in Early Help Units and Step Down Panels, open access				Stuart Collins, Director Integrated Services (Early Help)		

services or through targeted casework	and Preventative Services Lead)	
Intensive focus on ensuring early help to reduce the need for specialist children’s support services	Matt Dunkley, Corporate Director CYPE	
Early Help & Preventative Services have outlined priorities for service development and change, including ambitious targets to improve outcomes for children, young people and families	Stuart Collins, Director Integrated Services (Early Help and Preventative Services Lead)	
Kent Safeguarding Children Board ‘threshold’ document outlines the criteria required by partners when making a referral and have been working with partners to promote aid appropriate application	Mark Janaway, Programme and Performance Manager	
The Specialist Children’s Services budget has been increased to compensate for the additional demand	Dave Shipton, Acting Section 151 Officer	
Relationships with London Councils which allow us to understand / test their intentions on an individual site basis	David Whittle, Director SPRCA	
Action Title	Action Owner	Planned Completion Date
Implementation of Change for Children in Kent programme	Matt Dunkley, Corporate Director, CYPE	April 2019
Implementation of Front Door Integration Project to better manage ‘front door’ referrals	Sarah Hammond, Director of Integrated Services (Children’s Social Work Lead)	December 2018

Risk ID	CRR0009	Risk Title	Future financial and operating environment for Local Government			
Source / Cause of risk		Risk Event	Consequence	Risk Owner (s)	Current Likelihood	Current Impact
The operating environment for local government is likely to continue to change during the coming years, presenting both opportunities and risks for the Council and its partners / service providers.		Additional unfunded spending demands and continued real-terms funding reductions threaten the financial sustainability of KCC, its partners and service providers.	Unsustainable financial situation, ultimately resulting in s114 notice.	On behalf of CMT: Zena Cooke, Corporate Director Finance	Likely (4)	Major (5)
Government funding has continued to reduce, with a number of councils showing signs of financial stress and warning of moves toward a 'minimum service offer', including the issuing of the first section 114 notice for over 20 years.		In order to set a balanced budget the council is likely to have to continue to make significant year on year savings. Quality of KCC commissioned / delivered services suffers as financial situation continues to worsen.	Potential for partner or provider failure – including sufficiency gaps in provision.	Responsible Cabinet Member (s): All Cabinet Members	Target Residual Likelihood	Target Residual Impact
While KCC is not in this position, continuing budget challenges will necessitate difficult policy decisions being made regarding the future of services.		Insufficient Government Grant available to provide sufficient number of school places.	Reduction in resident satisfaction and reputational damage.		Possible (3)	Serious (4)
The Government's Spending Review in 2019; the Social Care Green Paper; NHS 10-year plan; current uncertainties relating to implications of Brexit and ongoing challenges to secure funding for essential infrastructure to keep pace with housing growth will all affect the operating framework for the Council.						
Limits on our ability to levy additional council tax without a						

referendum are still in place.		
Control Title	Control Owner	
Robust budgeting and financial planning in place via Medium Term Financial Planning (MTFP) process, including stakeholder consultation	Dave Shipton, Acting Section 151 Officer	
Processes in place for monitoring delivery of savings and budget as a whole	Dave Shipton, Acting Section 151 Officer	
KCC Strategic Statement 2015-2020 and annual report outline key strategic outcomes that the Authority aims to achieve during this period	Paul Carter, Leader of the Council	
KCC Quarterly Performance Report monitors key performance and activity information for KCC commissioned or delivered services. Regularly reported to Cabinet	Richard Fitzgerald, Business Intelligence Manager - Performance	
Ongoing oversight of implications relating to proposed Local Authority pension fund changes	Nick Vickers, Business Partner (external funding)	
Support being provided to the Leader of KCC in his role as Chair of the County Councils Network (CCN)	David Whittle, Director SPRCA	
Financial analysis conducted after each budget statement	Dave Shipton, Acting Section 151 Officer	
Engagement with CCN, other local authorities and Government of potential opportunities and issues around devolution and public reform	David Whittle, Director SPRCA	
Continued engagement with Government for a fair Basic Need allocation to meet the demand for school places	Keith Abbott, Director Education Planning and Access	
Action Title	Action Owner	Planned Completion Date
Work proactively with Government regarding how the new business rate retention scheme can be most effectively implemented	Dave Shipton, Acting Section 151 Officer	January 2019 (review)
Engage with Government for a fair-funding needs formula for Grant distribution and tariffs/top ups under business rate retention	Dave Shipton, Acting Section 151 Officer	January 2019 (review)
Assess implications of the NHS 10-year plan	David Whittle, Director SPRCA	January 2019

Ensure appropriate response to Government Spending Review 2019	Dave Shipton, Acting Section 151 Officer	September 2019
Assess impact of and respond to social care green paper	Penny Southern, Corporate Director ASCH	March 2019

Risk ID	CRR0011	Risk Title	Embedding KCC’s Strategic Commissioning approach and consistency of commissioning standards			
Source / Cause of risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
The Authority has developed a strategic commissioning approach, which is a journey in changing the systems, culture and approach the organisation takes to achieving its strategic outcomes.		Insufficient management capacity and / or capability in key skill areas to support sustained change.	Potential to fall short of achieving benefits if changes introduced are not fully embedded.	In collaboration with CMT: Vincent Godfrey, Strategic Commissioner	Possible (3)	Significant (3)
The approach aims to meet the need for comprehensive, professional strategic commissioning advice to all directorates across the Authority and requires a whole council ethos, as well as clarity of responsibility and accountability.		Lack of clarity over which activities can be defined as strategic commissioning as distinct from the specification of service outcomes.		Responsible Cabinet Member: Catherine Rankin, Strategic Commissioning	Target Residual Likelihood Unlikely (2)	Target Residual Impact Significant (3)
		Lack of buy-in to whole-council ethos to support the changes required.				
Control Title					Control Owner	
Senior role of Strategic Commissioner appointed, reporting to the Head of Paid Service, to oversee the delivery of strategic commissioning expertise					David Cockburn, Head of Paid Service	
Building capacity and capability in commissioning is a key area of KCC’s Organisation Development action plan					Julie Cudmore, Head of Organisation Development	
Cabinet Member role for Strategic Commissioning created					Paul Carter, Leader of the Council	
Rolling programme of reviews of contract management arrangements for major contracts embedded into Business as Usual and reported on regularly					Vincent Godfrey, Strategic Commissioner	
Commissioning Success: A strategy to improve lives by ensuring every pound spent in Kent is delivering better outcomes for Kent’s residents, communities and businesses through successful commissioning developed as part of a co-design process					Vincent Godfrey, Strategic Commissioner	

KCC has established a Strategic Commissioning Division to strengthen commissioning capability, and lead and shape commissioning activity, which has been restructured as a vehicle for achievement of business strategy	Vincent Godfrey, Strategic Commissioner	
Commissioning Standards Framework Group provides strategic oversight and agreement by executive Members and senior professional officers of the proposed minimum standards for strategic commissioning activity throughout the life cycle which will make up the Commissioning Framework	Catherine Rankin, Cabinet Member for Strategic Commissioning	
KCC informal Governance arrangements refreshed to include continued focus on improving quality of commissioning activity	Vincent Godfrey, Strategic Commissioner	
Action Title	Action Owner	Planned Completion Date
Work towards Chartered Institute of Procurement and Supply (CIPS) Excellence accreditation for the organisation	Vincent Godfrey, Strategic Commissioner	October 2019

Risk ID	CRR0013	Risk Title	Delivery of in-year savings within agreed budgets			
Source / Cause of Risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
The ongoing difficult public financial situation and economic uncertainty continue to mean significant reductions in funding to the public sector and Local Government in particular, at a time when spending pressures on councils are increasing.		Robust plans to achieve the required savings are not developed in time to enable implementation and realisation of benefits.	Urgent alternative savings need to be found which could have an adverse impact on service users and/or residents of Kent.	On behalf of CMT: Zena Cooke, Corporate Director Finance	Possible (3)	Significant (3)
KCC has already made significant cost savings and still needs to make significant ongoing year-on-year savings in order to "balance its books".		Plans are not aligned with Cabinet Member priorities.	Potential adverse impact on council transformation plans.	Responsible Cabinet Member(s):	Target Residual Likelihood	Target Residual Impact
			Depletion of the Council's financial reserves.	Peter Oakford, Finance and Traded Services	Unlikely (2)	Minor (1)
			Reputational damage to the council.			
Control Title					Control Owner	
Robust budgeting and financial planning in place via Medium Term Financial Planning (MTFP) process					Dave Shipton, Acting Section 151 Officer	
Process for monitoring delivery of savings is in place, including a Budget Delivery Group to scrutinise progress					Dave Shipton, Acting Section 151 Officer	
Robust monitoring and forecasting of arrangements in place relating to the KCC budget as a whole					Dave Shipton, Acting Section 151 Officer	
Procedures for appropriate consultation in place when decisions relating to changes in services are being considered					Diane Trollope, Head of Engagement & Consultation	
Controls and mechanisms remain robust					Dave Shipton, Acting Section 151 Officer	
Indicative cash limits and savings targets allocated to Corporate Directors to allow early planning					Corporate Directors and Director Group	
Six monthly update reports on progress against budgeted savings presented to Governance & Audit					Corporate Directors and	

Committee		Director Group
Continued engagement with the Home Office for a fair settlement for Unaccompanied Asylum-Seeking Children (UASC), particularly Care Leavers		Matt Dunkley, Corporate Director, CYPE
Action Title	Action Owner	Planned Completion Date
NOTE: Level of risk is expected to decrease during the year by effective operation of existing controls.		

Risk ID	CRR0014	Risk Title	Cyber-attack threats and their implications
----------------	----------------	-------------------	--

Source / Cause of Risk	Risk Event	Consequence	Risk Owner(s)	Current Likelihood	Current Impact
<p>The Council has a duty to protect personal and other sensitive data that it holds on its staff, service users and residents of Kent.</p> <p>KCC repels a high number of cyber-attacks on a daily basis, although organisations across all sectors are experiencing an increasing threat in recent times and must ensure that all reasonable methods are employed to mitigate them (within resource constraints), both in terms of prevention and preparedness of response in the event of any successful attack.</p> <p>KCC's ICT Strategy will move the Authority's technology to cloud based services. It is important to harness these new capabilities in terms of both IT security and resilience, whilst emerging threats are understood and managed.</p> <p>In information terms the other factor is human. Technology can only provide a level of protection. Our staff must have a strong awareness of their responsibilities in terms of IT and information security.</p>	<p>Successful cyber-attack (e.g. 'phishing' scam) leading to loss or unauthorised access to sensitive business data.</p> <p>Significant business interruption caused by a successful attack.</p>	<p>Data Protection breach and consequent Information Commissioner's Office (ICO) sanction.</p> <p>Damages claims.</p> <p>Reputational Damage.</p> <p>Potential significant impact on business interruption if systems require shutdown until magnitude of issue is investigated.</p>	<p>Rebecca Spore, Director Infrastructure</p> <p>Ben Watts, General Counsel and KCC Data Protection Officer</p> <p>Amanda Beer, Corporate Director Engagement, Organisational Design & Development.</p> <p>Responsible Cabinet Member(s): Eric Hotson, Corporate & Democratic Services</p>	<p>Likely (4)</p> <p>Target Residual Likelihood Possible (3)</p>	<p>Serious (4)</p> <p>Target Residual Impact Serious (4)</p>
Control Title				Control Owner	
Systems are configured in line with best practice security controls proportionate to the business information				Kathy Stevens, ICT	

being handled. Systems are risk assessed and reviewed to ensure compliance is maintained	Compliance and Risk Manager	
Staff are required to abide by IT policies that set out the required behaviour of staff in the use of the technology provided. These policies are reviewed on an annual basis for appropriateness	Kathy Stevens, ICT Compliance and Risk Manager	
Continual awareness raising of key risks amongst the workforce and manager oversight	Internal Communications function / Michael Lloyd, Head of Technology Commissioning and Strategy / / All Managers	
Electronic Communications User Policy, Virus reporting procedure and social media guidelines in place	Rebecca Spore, Director Infrastructure	
External reviews of the Authority’s security compliance are carried out to maintain accreditation and confirm best practice is applied	Kathy Stevens, ICT Compliance and Risk Manager	
Persistent monitoring of threats, network behaviours and data transfers to seek out possible breaches and take necessary action	Kathy Stevens, ICT Compliance and Risk Manager	
Data Protection and Information Governance training is mandatory and requires staff to refresh periodically. Progress rates monitored regularly	Ben Watts, General Counsel	
Further training introduced relating to cyber-crime, cyber security and social engineering to raise staff awareness and knowledge	Rebecca Spore, Director Infrastructure	
Messages to encourage increased awareness of information security amongst staff are to be communicated to align with key implementation milestones of the ICT Transformation Programme	Diane Trollope, Head of Engagement and Consultation	
Procedures to address data breaches from KCC ‘client side’ perspective are covered within the Infrastructure business continuity plan	Kathy Stevens, ICT Compliance and Risk Manager	
Monthly updated remediation plans produced for the Director of Infrastructure and Senior Information Risk Owner. Quarterly reporting to the Directorate Management Team	Kathy Stevens, ICT Compliance and Risk Manager	
Action Title	Action Owner	Planned Completion Date
Implementation of ICT Transformation Programme includes actions to further strengthen ICT resilience, with systems and software compliance with various UK Standards	Rebecca Spore, Director of Infrastructure	March 2019
Liaise with service partners / providers to ensure clarity regarding support available and respective responsibilities to address data breaches should	Kathy Stevens, ICT Compliance and Risk Manager	December 2018

they occur		
Develop a Cyber incident response policy which strengthens the responsibilities and accountabilities across the Authority	Kathy Stevens, ICT Compliance and Risk Manager	December 2018

Risk ID	CRR0015	Risk Title	Managing and working with the social care market			
Source / Cause of Risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
A significant proportion of adult social care is commissioned out to the private and voluntary sectors. This offers value for money but also means that KCC is dependent on a buoyant market to achieve best value and give service users optimal choice and control.		Care home and domiciliary care markets are not sustainable.	Gaps in the care market for certain types of care or in geographical areas meaning difficulty in placing some service users.	Penny Southern, Corporate Director ASCH, in collaboration with Vincent Godfrey, Strategic Commissioner	Likely (4)	Major (5)
Factors such as the introduction of the National Living Wage, potential inflationary pressures and uncertainty over care market workforce in light of new settled status arrangements mean that the care market is under pressure.		Inability to obtain the right kind of provider supply at affordable prices.			Target Residual Likelihood	Target Residual Impact
		Significant numbers of care home closures or service failures.		Responsible Cabinet Member(s):	Possible (3)	Major (5)
		Providers choose not to tender for services at Local Authority funding levels or accept service users with complex needs.		Graham Gibbens, Adult Social Care and Public Health Catherine Rankin Strategic Commissioning		
Control Title					Control Owner	
Opportunities for joint commissioning and procurement in partnership with key agencies (i.e. Health) being regularly explored, including joint work regarding the provision of dementia nursing beds					Vincent Godfrey, Strategic Commissioner	
As part of the Commissioning Success model, Analytics function to ensure good quality data to inform decision making before moving commissioning activity forward					Richard Fitzgerald, Business Intelligence Manager, Performance / Steph Smith, Head of Performance and Information	

Regular meetings with provider and trade organisations	Vincent Godfrey, Strategic Commissioner	
Ongoing Contract Monitoring, working in partnership with the Access to Resources team	Clare Maynard, Head of Commissioning Portfolio – Outcome 2 and 3	
Ongoing monitoring of Home Care market and market coverage. Commissioners and operational managers reviewing the capacity of the Home Care market with a view to developing a strategy to ensure market coverage	Jo Empson, Commissioning Manager, Community Support	
Ensuring contracts have indexation clauses built-in, managed through contract monitoring	Georgina Aplin, Head of Commissioning Support	
KCC is part of local and regional Quality Surveillance Groups that systematically bring together the different parts of the health and care system to share information, identify and mitigate risks to quality, including those relating to care providers	Penny Southern, Corporate Director ASCH (KCC lead)	
Ongoing work to improve maturity of the market	Vincent Godfrey, Strategic Commissioner	
Action Title	Action Owner	Planned Completion Date
Recommissioning of Homecare, Supporting Independence Service and discharge to assess as part of the ‘Care in the Home’ project	Jo Empson, Commissioning Manager, Community Support	April 2019
Implementation of refreshed Accommodation Strategy, developed with partners and key stakeholders. Need to have Extra Care beds onstream by 2020	Clare Maynard, Head of Commissioning Portfolio – outcome 2 and 3	April 2019 (review)

Risk ID	CRR0016	Risk Title	Delivery of New School Places is constrained by capital budget pressures and dependency upon the Education and Skills Funding Agency (ESFA)			
Source / Cause of risk A significant expansion of schools is required to accommodate major population growth in the short term to medium term (primary age) and medium to long term (secondary age). The "Basic Need" capital grant from Dept of Education (DfE) will not fund the expansion in full. A funding gap to deliver the programme for schools will be created by cost pressures from higher than expected build costs, low contributions from developers and increases in pupil demand. Whilst the funding gap identified with the Kent Commissioning Plan has been closed, the delivery of the plan is highly dependent upon securing a number of Free Schools in Kent over the period and that the ESFA complete the Free School projects on time and to an appropriate standard.		Risk Event The expansion required may not be delivered, meaning KCC is not able to provide appropriate school places. Further upward demand pressures beyond what is forecast.	Consequence Some children have to travel much further to attend a school, with a resulting impact on the transport budget. The duty to provide sufficient school places is not met, which may lead to legal action against the council.	Risk Owner Matt Dunkley, Corporate Director CYPE Responsible Cabinet Member(s): Roger Gough, Children, Young People and Education	Current Likelihood Likely (4) Target Residual Likelihood Likely (4)	Current Impact Serious (4) Target Residual Impact Significant (3)
Control Title					Control Owner	
The Kent Commissioning Plan contains the forecast expansion numbers and locations. A school expansion programme has been mapped, costed and kept under review					Keith Abbott, Director Education Planning and Access	

The school expansion programme is under member scrutiny and review by relevant Education and Property programme boards/forums/committees	Keith Abbott, Director Education Planning and Access	
CYPE capital monitoring mechanism with Member involvement now created	Education Planning and Access DivMT	
Policy and operations to secure sufficient developer contributions are overseen by Growth and Infrastructure Group	Keith Abbott, Director Education Planning and Access/Stephanie Holt-Castle, Interim Director Environment, Planning and Enforcement	
A bid has been made for extra funding under the priority school building programme Phase 2	Keith Abbott, Director Education Planning and Access	
Negotiations have taken place with District Councils regarding allocation of contributions	Area Education Officers	
Close working with the ESFA and lobbying of the DfE/ESFA, Secretary of State and Kent MPs raising of the issue via the County Councils Network	Keith Abbott, Director Education Planning and Access / Cabinet Member CYPE / Leader of the Council	
Regular meetings with ESFA officials to monitor progress at individual project level and identify ways in which KCC can help progress these projects (Local delivery)	Keith Abbott, Director Education Planning and Access	
Contingency plans for alternative interim accommodation for each Free School project are being developed on a case-by-case basis i.e. temporary expansions to schools to meet immediate pressures, or the allocation of available places within existing schools	Keith Abbott, Director Education Planning and Access	
Action Title	Action Owner	Planned Completion Date
Put forward bids for next wave of selective schools' expansion fund	Keith Abbott, Director of Education	July 2019

Risk ID	CRR0039	Risk Title	Information Governance			
Source / Cause of risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
The Council is required to maintain the confidentiality, integrity and proper use of data under the Data Protection Act 2018.		Failure to embed the appropriate processes and procedures to meet the new regulations.	Information Commissioner's Office sanction (e.g. undertaking, assessment, improvement, enforcement or monetary penalty notice issued against the Authority).	Ben Watts, General Counsel and Data Protection Officer in collaboration with David Whittle, Senior Information Risk Owner	Possible (3)	Serious (4)
General Data Protection Regulations (GDPR) came into effect that have introduced significantly increased obligations on all data controllers, including the Council.		Information security incidents (caused by both human error and / or system compromise) resulting in loss of personal data or breach of privacy / confidentiality.	Serious breaches under GDPR could attract a fine of €20m.	Responsible Cabinet Member: Eric Hotson, Corporate & Democratic Services	Target Residual Likelihood	Target Residual Impact
There is insufficient resource available to undertake comprehensive oversight / assurance activity that provides assurance on compliance with existing information governance standards.		Council accreditation for access to government and partner ICT data, systems and network is withdrawn.	Increased risk of litigation.		Unlikely (2)	Serious (4)
There is a critical dependency on one of the Council's Local Authority Trading Companies (CBS) to support Information Governance compliance for the KCC systems and network.		Cantium Business Solutions prioritises commercial work or does not undertake information governance compliance work in an appropriate and timely fashion.	Reputational damage.			
KCC services' requirement for non-standard systems creates vulnerabilities.						
Control Title					Control Owner	
Data Protection Officer in place to act as designated contact with the Information Commissioner's Office					Ben Watts, General Counsel	

Caldicott Guardian appointed with training and support to undertake the role	Penny Southern, Corporate Director ASCH	
Senior Information Risk Owner for the Council appointed with training and support to undertake the role	David Whittle, Director SPRCA	
Corporate Information Governance group to allow for effective management of information governance risks and issues between the DPO, SIRO and Caldicott Guardian	Ben Watts, General Counsel	
Management Guide / Operating Modules on Information Governance in place, highlighting key policies and procedures	Caroline Dodge, Team Leader Information Resilience & Transparency	
A number of policies and procedures are in place including KCC Information Governance Policy; Information Governance Management Framework; Information Security Policy; Data Protection Policy; Freedom of Information Policy; and Environmental Information Regulations Policy all in place and reviewed regularly	Ben Watts, General Counsel	
Staff are required to complete mandatory training on Information Governance and Data Protection and refresh their knowledge every two years as a minimum	Ben Watts, General Counsel / Amanda Beer, Corporate Director EODD	
ICT Commissioning function has necessary working / contractual relationship with the Cantium Business Solutions to require support on KCC ICT compliance and audit	Rebecca Spore, Director of Infrastructure	
Information Resilience and Transparency team in place, providing business information governance support	Caroline Dodge, Team Leader Information Resilience & Transparency	
Privacy notices as well as procedures/protocols for investigating and reporting data breaches reviewed and updated	Caroline Dodge, Team Leader Information Resilience & Transparency	
Action Title	Action Owner	Planned Completion Date
Finalise implementation of any outstanding actions arising from 2016 Information Commissioner’s Office (ICO) audit	Ben Watts, General Counsel	January 2019
Refresh of cross-directorate Information Governance Working Group, with key risks and issues raised to the Corporate IG group	Lauren McCann, Principal Solicitor	November 2018
Development of stand-alone Information Governance risk register	David Whittle, Director SPRCA	January 2019

Risk ID	CRR0040	Risk Title	Opportunities and risks associated with KCC's Local Authority Trading Companies (LATCos)			
Source / Cause of risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
KCC has established a number of wholly-owned companies delivering a wide range of professional services that can bring benefits such as a change in culture and a more commercial approach to delivering services; more freedom to invest; the ability to secure new external clients; and the ability to grow the business and return a dividend to the Council as shareholder.		Expected financial dividends not met or return on investment takes longer than planned to achieve.	Additional pressures on Council budget.	KCC Shareholder Boards	Likely (4)	Significant (3)
As with any new company start up, there will also be risks to be managed.		One or more company acts in a way that does not fit with KCC's values.	Reputational damage.			
With the number of wholly-owned companies increasing, the council has reached a cross-over point where the wider objectives of the shareholder (KCC) is of at least the same importance as the individual needs of the new companies.		Council attempts to manage or run individual companies rather than acting as shareholder to extract the maximum value and benefit for the council in terms of both financial return and delivery of our identified outcomes as the owner of the businesses.	Companies may not be able to take advantage of commercial opportunities if decision-making is restricted.	Responsible Cabinet Member:	Target Residual Likelihood	Target Residual Impact
KCC does not make the necessary internal changes / decisions (e.g. internal commissioning arrangements) necessary to support the delivery of the agreed business plans of trading companies.		Insufficient quality of service from company to KCC 'client'.		Peter Oakford, Finance and Traded Services	Unlikely (2)	Moderate (2)
				Supported by:		
				Richard Long, Cabinet Lead for Traded Services		
Control Title					Control Owner	

Governance: shareholder and company boards exist for KCC-owned companies with respective roles, with matters reserved for shareholder decision outlined	Ben Watts, General Counsel	
Cultural and change factors are built into the planning for proposed creation of alternative service delivery models	Julie Cudmore, Head of Organisation Development	
KCC’s Group Audit function conducts audits for KCC-owned companies	Robert Patterson, Head of Internal Audit	
Robust business cases developed for proposed new companies, subject to Member and Officer scrutiny – including consideration of market potential, governance arrangements etc.	Relevant Cabinet Member and Corporate Director.	
KCC company governance and ownership reviewed with regular updates given to Policy & Resources Cabinet Committee	Richard Long, Cabinet Lead for Traded Services / David Cockburn, Head of Paid Service / Ben Watts, General Counsel / Dave Shipton, Acting Section 151 Officer	
Action Title	Action Owner	Planned Completion Date
The Council is effecting changes to the constitution and Member scrutiny to support effective oversight and input by Members	Ben Watts, General Counsel	December 2018
Implementation of holding arrangements for KCC’s companies	Ben Watts, General Counsel	April 2019 (review)
To develop exit strategies in relation to all businesses from a commissioning and shareholder perspective against various potential outcomes	Relevant commissioners / Share holder Boards	December 2018 (review)
Accommodation solution agreed to support Cantium Business Solutions requirement for co-location of staff as per agreed Business Plan	Rebecca Spore, Director Infrastructure	April 2019

Risk ID	CRR0041	Risk Title	Maintaining a healthy and effective workforce			
Source / Cause of risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
KCC's workforce makes a vital contribution to the delivery of the Council's strategic outcomes, through its energy, commitment and hard work.		Low morale or stress related to organisational change or other factors.	Negative impact on productivity and levels of service.	Corporate Management Team	Possible (3)	Serious (4)
Staff across the organisation need to be healthy, motivated and have the right skills to help the organisation develop.		Increased sickness levels.				
It is important that this continues through challenging times, with significant change becoming the new reality and further year-on-year efficiencies being required to meet difficult budgetary challenges.		Lack of depth / resilience of key personnel or teams.				
		Increasing demands on staff leads to insufficient capacity.				
				Responsible Cabinet Member:	Target Residual Likelihood	Target Residual Impact
				Eric Hotson, Corporate and Democratic Services	Unlikely (2)	Serious (4)
Control Title					Control Owner	
Refreshed approach to managing people and performance focusing in particular on regular, high quality conversations between managers and staff and emphasising management accountability and employee engagement					Amanda Beer, Corporate Director EODD	
Annual staff survey (Employment Value Proposition – EVP) builds insight by looking at the perceived balance between what the organisation offers staff and what employees bring to the job					Amanda Beer, Corporate Director EODD	
Wellbeing initiatives and health promotions for staff					Paul Royel, Head of Human Resources (HR) and Organisation Development (OD)	
Arrangements in place for active monitoring and response to absence					Paul Royel, Head of HR and OD	

Employee engagement strategy in place	Paul Royel, Head of HR and OD	
iResilience tools available	Amanda Beer, Corporate Director EODD	
Staff care services provide professional occupational health, counselling (Support Line); coaching and mediation services to help ensure staff are physically, emotionally and mentally well	Mark Scott, Chief Executive Cantium Business Solutions	
Suite of key performance indicators being monitored as early warning indicators e.g. retention, absence	Amanda Beer, Corporate Director EODD	
Directorate Organisation Development groups share best practice and facilitates communication on key OD issues	Julie Cudmore, Head of Organisation Development	
Service redesigns take account of capacity and capability issues ensuring resources are allocated appropriately	Corporate Management Team	
Significant and positive engagement with staff representatives	Paul Royel, Head of Human Resources (HR) and Organisation Development (OD)	
Comprehensive leadership and management training & development offer available	Paul Royel, Head of Human Resources and Organisation Development	
Action Title	Action Owner	Planned Completion Date
Analyse findings from autumn 2018 staff survey, share results and work with CMT to respond accordingly	Amanda Beer, Corporate Director EODD	January 2019

Risk ID	CRR0042	Risk Title	Post-Brexit border systems, infrastructure and regulatory arrangements			
Source / Cause of risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
The personnel, procedures, systems and physical infrastructure necessary to provide sufficient capacity and capability for fast and efficient flow of goods and people through the Dover / Continental Ports and Eurotunnel in accordance post-Brexit requirements are not in place as required. KCC is reliant on coherent, coordinated governance across Government to aid the Local Authority and partners locally in planning their contingency arrangements.		That the ‘implementation period’ agreed between UK leaving the EU is not enacted leading to immediate third country status for the UK on 29 March 2019.	Significant slowdown in the existing flow of goods and people through the Kent Ports leads to long delays in accessing Dover Ports and Eurotunnel.	Barbara Cooper, Corporate Director Growth, Environment & Transport	Likely (4)	Major (5)
		That the implementation period agreed between the UK and EU is insufficient to develop the personnel, procedures, systems and physical infrastructure in time to support post-Brexit border arrangements.	Temporary closure or permanent changes to all or part of the M20 or M26 to support Operation Stack / Brock and other mitigations for port delays.	Responsible Cabinet Member	Target Residual Likelihood	Target Residual Impact
		That a customs arrangement between the UK and EU is not agreed and there are delays in the physical transport of people / goods across the border.	Significant reduction in the capacity of the Kent Highway Network, with consequential increase in local and pan-Kent road journey times, impacting on local residents and businesses.	Mike Whiting, Planning, Highways, Transport & Waste	Likely (4)	Serious (4)
		That the Government does not provide sufficient capital and revenue financial support to departments, agencies, local authorities and other infrastructure stakeholders necessary to address the personnel, procedures and physical infrastructure to support post-Brexit border arrangements.	Significant long-term detrimental impact on county’s economic competitiveness, attractiveness for inward investment and quality of life for Kent residents.	Mike Hill, Community Services		

Control Title		Control Owner
Regular engagement with senior colleagues in relevant Government Departments on the impacts and implications of Brexit on KCC's regulatory responsibilities relating to Trading Standards and the resilience of Kent highways		Barbara Cooper, Corporate Director GET
KCC membership and co-chair of the Kent Border Planning Steering Group and associated working groups such as Emergency Planning, Infrastructure etc.		Stephanie Holt-Castle, Interim Director Environment, Planning and Enforcement
Internal KCC co-ordination through a Brexit Co-ordination Group and Informal Members Group		David Whittle, Director SPRCA
KCC leads and manages the Kent Strategic Freight Forum		Barbara Cooper, Corporate Director, GET
KCC membership and support to the Kent Resilience Forum Brexit Sub-Group		Fiona Gaffney, Head of Resilience and Emergency Planning
KCC involvement in Operation Fennel Tactical Group (multi-agency planning group for potential disruption at Port of Dover and Eurotunnel)		Barbara Cooper, Corporate Director, GET (KCC lead)
KCC response to the Highways England M20 consultation on interim on-highway solution in place for the implementation period endorsed		Stephanie Holt-Castle, Interim Director EPE
Action Title	Action Owner	Planned Completion Date
Engaging with Government on exercise(s) testing emergency response capability in relation to potential post-Brexit scenarios	Fiona Gaffney, Head of Resilience and Emergency Planning	Ongoing
KCC services to review business continuity arrangements, taking potential no-deal Brexit scenarios into consideration	Service Managers	December 2018
KCC exploring opportunities with the Ministry for Housing, Communities and Local Government (MHCLG) regarding funding for the direct impacts of Brexit in the county	Stephanie Holt-Castle, Interim Director Environment, Planning and Enforcement	February 2019

Risk ID	CRR0044	Risk Title	High Needs Funding and adequacy of support for children with SEND			
Source / Cause of risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
The Children and Families Act 2014 introduced significant changes to Specialist Educational Needs (SEN) through the duty to ensure that the views, wishes and feelings of parents are heard, leading to a raising of expectations of parents.		There is a risk that the SEN service within KCC will fail to deliver an acceptable service to parents and children requiring SEN services within Kent, and/or fails to meet statutory time limits for providing support.	Unless processes and practices are reviewed and made to be more efficient and effective, families may fail to receive a supportive, acceptable service from SEN within Kent. Families feel neglected and supported. Ultimately the delivery of such a level of service could lead to legal action if statutory time limits or processes are not met.	Matt Dunkley Corporate Director CYPE	Likely (4)	Major (5)
The number of Children and Young People with Specialist Educational Needs and Disability (SEND) is rising faster than the underlying growth in population. Kent is now maintaining over 10,500 Education Health and Care Plans (EHCP) which represents a growth of over 40% in the last 4 years. In addition, the incidence of EHCP's being maintained and issued to young people aged 19+ has grown exponentially.					Target Residual Likelihood	Target Residual Impact
The available budget is not enough to address the growth in demand, and the level of DSG High Needs Funding is effectively capped for the next 4 years.					Possible (3)	Serious (4)
KCC needs to address a backlog of over 650 Educational Psychology assessments.						
				Responsible Cabinet Member(s): Roger Gough Children, Young People and Education		

Control Title		Control Owner
Continual lobbying of Government to highlight the matter at national level i.e. via County Council Network, Association of Directors' of Children's Services		Paul Carter, Leader of the Council / Roger Gough, Cabinet Member CYPE / Matt Dunkley, Corporate Director CYPE
Recruitment and Retention arrangements for Educational Psychologists are competitive and enable us to recruit and retain staff in our most critical and demanding roles and teams		Andrew Heather (Principal Educational Psychologist)
A Special Educational Needs Action Plan has been prepared		Louise Langley (Interim Head of SEN)
SEN Provision Evaluation Officers now support SEN Teams with ensuring schools have used their best endeavours to seeking Statutory Assessment and the views of schools are considered		Louise Langley (Interim Head of SEN)
Weekly placement panels implemented for independent school placements (with a view that local provision is preferred).		Louise Langley (Interim Head of SEN)
CYPE Service Development Team supporting improvements by developing a service development project.		Louise Langley (Interim Head of SEN)
Action Title	Action Owner	Planned Completion Date
Triage backlog of Educational Psychology assessments and consider priorities. West Kent pilot completed – wider rollout in progress.	Andrew Heather, Principal Educational Psychologist	March 2019
Moderation of EHCP's to ensure compliance to expected standards	Louise Langley Interim Head of SEN	January 2019
Ensure that contracts with independent schools stipulate financial penalties for low or non-attendance of pupils	Louise Langley Interim Head of SEN	April 2019
Increase the numbers of pre-emptive meetings and mediation with parents to seek resolution	Louise Langley Interim Head of SEN	January 2019
Increase mainstream school's capacity to meet SEN provision	Louise Langley Interim Head of SEN	July 2019
Work with the Disabled Children's Service to develop joint pathways into adulthood for post 16 and post 19 SEND young people	Louise Langley Interim Head of SEN	April 2019
For young people with the most severe and complex needs, develop a	Louise Langley Interim Head of	April 2019

process for working with social care and health to support and plan lifespan pathways from year 10 annual reviews onwards	SEN	
Appointment of additional posts to provide additional focus on quality issues and early resolution of complaints	Matt Dunkley, Corporate Director, CYPE	May 2019

Risk ID	CRR0045	Risk Title: Effectiveness of governance within a Member-led Authority				
Source / Cause of risk		Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact
The continuation of a challenging financial and operating environment for Local Government (see risk CRR0009) will require difficult policy decisions to be made in a timely manner, which requires continued effective governance and robust internal control mechanisms.		Members are unwilling or unable to agree necessary policy (service) decisions to deliver a legally balanced budget and sustainable medium-term financial plan (MTFP).	Decisions challenged under judicial review on the appropriateness of the decision-making within KCC	Paul Carter, Leader of the Council	Unlikely (2)	Major (5)
At a strongly Member-led Authority such as KCC, this places dependency / risk on the effectiveness of the member governance of the Council. It is crucial that the Council avoids some of the inherent risks such as:		Members agree a budget requiring unrealistic and undeliverable efficiency savings leading to significant in-year overspends.	Monitoring Officer / Head of Paid Service statutory report to Council	David Cockburn, Head of Paid Service	Target Residual Likelihood	Target Residual Impact
Over reliance on informal governance arrangements and political group meetings to direct officers and make decisions outside of formal statutory decision-making and scrutiny arrangements.		Officers act on direction from members which has no basis in statutory decision making or the Council's constitution.	Reputational damage to the Council		Very Unlikely (1)	Major (5)
Policy options regarding the service offer of the Council are not adequately or appropriately considered within the budget development/approval process.		Statutory officers (S151, Monitoring Officer, Head of Paid Service) are required to use their powers to intervene or alert the Council to inappropriate/illegal decision-making.	S114 Notice issued by the S151 Officer			
Failure of the governance structures of the of the council (Cabinet, Cabinet Committee, Full						

<p>Council, Scrutiny Committee/Governance & Audit) to provide robust internal and external oversight, scrutiny and challenge of budget options and delivery of agreed MTFP savings programme.</p> <p>Unwillingness of elected Members to appropriately consider advice from professional / statutory officers and / or professional / statutory officers failing in their duty to provide robust professional advice needed by Member to effectively discharge their member leadership role.</p>	
Control Title	Control Owner
Strategic Statement agreed by County Council and published setting out medium-term objectives and priorities of the Council	Paul Carter, Leader of the Council
MTFP and Budget Book agreed by Full Council and support/briefing provided for all political groups by officers on budget development options	Zena Cooke, Corporate Director Finance
Key and significant decision-making process in place for Executive decisions and appropriately published Forward Plan of Executive Decisions	Ben Watts, General Counsel
Transformation plans and/or business cases for strategic change underpinning MTFP shared with non-executive members through Cabinet Committees as part of the executive decision-making arrangements	David Cockburn, Head of Paid Service
Member and Officer codes of conduct in place and robustly monitored and enforced	Ben Watts, General Counsel
Member development and training programme in place and overseen by Selection and Member Services Committee	Ben Watts, General Counsel
Appropriate officer development and training programme in place and overseen by CMT	Amanda Beer, Corporate Director – EODD

Appropriately detailed and timely financial monitoring reports considered by Cabinet and Cabinet Committees	Zena Cooke, Corporate Director Finance	
Appropriate performance reporting of service and corporate performance to Cabinet, Cabinet Committee and Full Council	David Cockburn, Head of Paid Service	
Effective internal audit arrangements in place and robust monitoring arrangements for the delivery of internal audit recommendations to Governance & Audit Committee	Zena Cooke, Corporate Director Finance	
Provision for Chief Officers to seek written direction from Executive Members within the KCC Constitution	Ben Watts, General Counsel	
Annual Governance Statement (AGS) arrangements in place with returns made across both senior and statutory officers	Ben Watts., General Counsel	
Appropriate and effective corporate risk management procedures in place for the Council	David Whittle, Director SPRCA	
Democratic Services appropriately resourced to support effective Committee governance and scrutiny arrangements	Ben Watts, General Counsel	
Action Title	Action Owner	Planned Completion Date
Informal member governance arrangements authorised by the KCC Constitution, jointly agreed by the Head of Paid Service and the Leader and set out published document on KNet	David Whittle, Director SPRCA	December 2018
New ‘operating standards’ for KCC officers to be published on KNet	David Whittle, Director SPRCA	December 2018
Development of single Strategic Delivery Plan for KCC	David Whittle, Director SPRCA	March 2019
Refresh of the KCC constitution	Ben Watts, General Counsel	April 2019